

1 THE HONORABLE RICARDO S. MARTINEZ
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 SEATTLE DIVISION

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14 NW MONITORING LLC, a Delaware
15 limited liability company,

16 Plaintiff,
17 v.
18

19 SUSAN L. HOLLANDER, et al.

20 Defendants.

21 No. 3:20-cv-05572-RSM

22 STIPULATED MOTION AND ORDER TO
23 STAY CASE SCHEDULE PENDING
24 MEDIATION

25 Noting Date: June 14, 2021

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27 **STIPULATED MOTION TO STAY PENDING MEDIATION**

28 All Parties jointly file this Stipulated Motion to Stay Case Schedule Pending Mediation.

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31 **I. BACKGROUND**

32 On April 15, 2021, this Court granted in part and denied in part Defendants' Motions to
33 Dismiss.

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35 On April 29, 2021 this Court granted the parties' Stipulated Motion Regarding Discovery and
36 Fed. R. Civ. P. 26(f) Deadlines (Dkt. No. 28), setting new discovery deadlines as follows:

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44 1. The deadline for the parties to conduct a Rule 26(f) conference shall be continued to
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46 fourteen (14) days after all Defendants have filed their Answers to the Complaint or
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48 Amended Complaint.

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2. The deadline for the parties to exchange initial disclosures shall be continued to seven (7) days after the continued Rule 26(f) conference deadline.

3. The deadline for the parties to submit a Joint Status Report to the Court shall be continued to fourteen (14) days after the continued Rule 26(f) deadline.

On May 20, 2021, Defendants filed their respective Answers to Plaintiff's Complaint. Dkt. Nos. 29, 31-32.

II. MOTION

The parties have conferred and jointly agree that early mediation may be beneficial to potentially resolve this matter. The parties thus jointly move this Court to enter an order staying these proceedings until the resolution of mediation as follows:

1. Plaintiff Northwest Monitoring LLC will, within thirty (30) days of this Order, provide Defendants with its settlement demand with computation of all damages. To the degree necessary, Plaintiff will provide the supporting documentation as to its claimed damages.

2. All parties will, within fourteen (14) days of this Order, provide the insurance information required to be disclosed by Fed. R. Civ. P. 26(a)(1)(iv).

3. The parties will participate in mediation as soon as reasonably practicable, and in any case, not later than one hundred and fifty (150) days of this Order.

4. Within fourteen (14) days after the conclusion of the mediation, the parties shall submit a joint status report regarding the outcome of the mediation.

5. Except as noted above, the current case schedule, including all Discovery and Fed. R. Civ. P. 26(f) deadlines, is hereby stayed.

STIP. MOTION AND ORDER TO STAY PENDING
MEDIATION
(NO. 3:20-CV-05572-RSM) - 2

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6 DATED June 14, 2021.

YOUNGLOVE & COKER, P.L.L.C.

7
8 s/Gregory M. Rhodes
9 GREGORY M. RHODES, WSBA #33897
10 Attorney for Defendant Wolfe
11
12

13 DATED June 14, 2021.

PERKINS COIE, LLP

14
15 s/Christian W. Marcelo
16 CHRISTIAN W. MARCELO, WSBA #51193
17 DAVID A. PEREZ, WSBA #43959
18 Attorneys for Defendants Parkinson and 4319
19 Consulting, Inc.
20
21

22 DATED June 14, 2021.

BEAN LAW GROUP

23
24 s/Matthew J. Bean
25 MATTHEW J. BEAN, WSBA #23221
26 CODY FENTON-ROBERTSON, WSBA #47879
27 Attorneys for Defendants Hollander, M.D.
28
29

30 DATED June 14, 2021.

ZEHNDER LAW LLP

31
32 s/John E. Zehnder
33 JOHN E. ZEHNDER, WSBA #29440
34 JOSEPH P. ZEHNDER JR., WSBA #28404
35 Attorneys for Plaintiff NW Monitoring LLC
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38 ORDER

40 Pursuant to Stipulated Motion, IT IS SO ORDERED.
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42 DATED this 15th day of June, 2021.
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48 RICARDO S. MARTINEZ
49 CHIEF UNITED STATES DISTRICT JUDGE
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STIP. MOTION AND ORDER TO STAY PENDING
MEDIATION
(NO. 3:20-CV-05572-RSM) – 3

CERTIFICATE OF SERVICE

I certify under penalty of perjury that on June 14, 2021, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to attorneys of record for all parties.

DATED this 14th day of June, 2021.

/s/ Christian W. Marcelo

Christian W. Marcelo, WSBA No. 51193

Perkins Coie LLP

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206.359.8000

Facsimile: 206.359.9000

Attorney for Defendants

JEFFERY PARKINSON and his

COMMUNITY PROPERTY, and 4319

CONSULTING, INC.

CERTIFICATE OF SERVICE
(NO. 3:20-CV-05572-RSM) – 1